

To ensure the Calling Number Identification Presentation (CNIP) service continues to deliver the appropriate number to the called party the MSC must populate the calling party number parameter with the MDN in the ISUP IAM.

#### **5.6.1 Registration/Validation**

The impacts on the MSC due to the proposed WNP architecture, pertaining to the MS registration and validation, are the following:

- The MSC must support (or at least portions of) IS-41 Revision C (or equivalent) protocols for the Mobile Application Part if the MSC is to perform NP functions.
- The MSC must send the registration request to the HLR requiring GTT of the MSID digits at the STPs.
  - IMSI will use a TT of 9, and MIN will use a TT of 3.
  - IS-41 Revision C must be modified to include the MSID in place of the MIN as a mandatory parameter in the RegistrationNotification message.
- The MSC will receive an HLR response to the registration/validation message which is MTP routed from the HLR. The profile macro in the response message must include the DN of the MS.
- The MSC must be able to differentiate between MSID and MDN and to store them in the call register.

#### **5.6.2 Call Origination**

The impacts on the MSC due to the proposed WNP architecture, pertaining to the MS call origination, are the following:

- The originating MSC must populate the CgPN in the ISUP IAM with the MDN. This MDN is obtained from MS's HLR in the response to the registration response.
- The originating MSC must populate the Charge Party Number in the ISUP IAM with the MDN. This DN is obtained from MS's HLR in the response to the registration response.
- If the CdPN belongs to a ported NPA-NXX block, then the following must hold true:
  - The MSC must have a trigger for the NP-SCP query when the MSC determines that the call is intra-LATA and non-local. The MSC will query the NP-SCP using the WNP Query message to obtain the LRN of the entry switch of the ported number.
  - The MSC must be able to interpret the response received from the NP-SCP. The response contains the LRN for ported DNs and the dialed DN for non-portable DNs.

- Upon receiving the LRN, the MSC must send an ISUP IAM message, to the next switch with the  $m$ th bit set in the FCI, the CdPN set to the retrieved LRN, the CgPN set to the MDN of the calling party, and the GAP parameters set to the dialed DN.
- If the MDN is not ported, the NP-SCP will respond with the CdPN parameter set to the dialed DN in the response message. The MSC must be able to process this message.
- If MSC determines that it is an inter-LATA call, it must route the call to the appropriate IXC for further processing using ISUP or Multi-Frequency (MF) trunk set up messages. The IXC may then perform the query to the NP-SCP.

### 5.6.3 Call Delivery

The impacts on the MSC due to the proposed WNP architecture, pertaining to the MS call delivery, are the following:

- The MSC must be able to process the IAM parameters, including the FCI  $m$ th bit and the GAP.
- The MSC pointed to by the LRN (i.e., entry MSC) must recognize the LRN in the CdPN as its own. It must then replace the CdPN value with the GAP value. This new CdPN will then be processed by the MSC as usual.

The MSC will send a query to its HLR based on the MDN received from the ISUP message. Since the MDN is different from MSID and since multiple HLRs may be supported at the MSC (for some networks), a special translation of the DN may be needed to locate the HLR.

- When setting up the trunk to the Serving network, the MSC must populate the IAM message with the CdPN equal to the TLDN, the GAP equal to the MDN, and the FCI indicator as set (no query is necessary during this leg of the call).
- If the call is forwarded to another number, the entry MSC must treat the forwarded number as a new dialed number and follow the LRN solution. Thus, if the forwarded number is within a ported range, the MSC will query the NP-SCP to get the LRN of the destination switch.

## 5.7 Impacts to Interconnection Types

There are two basic types of interconnection used by wireless carriers for interconnecting with the PSTN<sup>34 35</sup>, Type 1 and Type 2. Type 1 and Type 2 trunks can be used for interchanging

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<sup>34</sup> EIA/TIA IS-93 Cellular Radio Telecommunications A, D, Interfaces Standard

<sup>35</sup> Bellcore GR-145 Compatibility Information for WSP-LEC Interconnection

traffic in both directions, i.e. wireless-to-wireline and wireline-to-wireless. A description of these interconnection types and the impacts of WNP follows.

#### **5.7.1 Type 1**

Type 1 interconnection is a trunk interconnection between an MSC and a wireline End Office switch and can support interchange of traffic between the MSC and the PSTN. This includes traffic to and from customers served by that Type 1 office, traffic to and from other end offices and MSCs in the local network, and traffic to and from long distance carriers. Type 1 trunks also support interchange of other types of traffic (i.e., ancillary traffic) such as operator services, directory assistance, and emergency service access (i.e., 911).

Since Type 1 trunks are configured as trunks with line treatment (TWLT) at the Type 1 end office, they can only support MF or ISDN access signaling and not SS7 ISUP signaling. Therefore, the substitution of the LRN in the CdPN, and the use of the FCI and GAP parameters proposed in the SS7 ISUP IAM for NP cannot be supported by Type 1 trunks. Consequently, providers using Type 1 trunks for wireless-to-wireline calls following an NP-SCP query by an MSC will lose the benefit of the query.

Type 1 trunks can continue to be used for wireless-to-wireline calls (including wireless-to-wireless via the wireline) in an NP environment in the following instances:

- (a) where a WSP establishes a business agreement with the Type 1 service provider to perform the NP queries,
- (b) for calls to non-ported NPA-NXXs,
- (c) for long distance calls where the LXC, and not the Type 1 service provider, would perform the NP query, and
- (d) for ancillary services such as operator services, directory assistance, and emergency service access.

Type 1 trunks can also continue to be used for wireline-to-wireless calls (including wireless-to-wireless via the wireline) in an NP environment where there exist no ported numbers within the entire NPA-NXX in the WSP's Type 1 number range.

If type 1 interconnects are to be replaced with an interconnection type such as type 2A-SS7 to support the LRN call routing method, the MSC will need to be re-homed from the end office to an access tandem.

#### **5.7.2 Type 2**

There are multiple Type 2 interconnections, i.e. Type 2A, 2B, 2C & 2D.

- Type 2A interconnection is a trunk interconnection between an MSC and a wireline tandem switch, and can support interchange of traffic between the MSC and the PSTN. This can include traffic to and from end offices and other MSCs served by that Type 2A tandem switch, and traffic to and from long distance carriers if the Type 2A tandem also serves as an access tandem. Type 2A trunks can operate with MF or SS7 ISUP signaling. To support NP, Type 2A trunks must be converted to SS7 ISUP in order to be able to send and receive the LRN in the CdPN, and the FCI and GAP parameters in the SS7 ISUP IAM.
- Type 2B interconnection is a trunk interconnection between an MSC and a wireline end office switch, and can support interchange of traffic between the MSC and only customers served by that Type 2B office. Type 2B trunks can operate with MF or SS7 ISUP signaling and are usually provisioned to allow overflow traffic to route to an associated Type 2A trunk group. To support NP, Type 2B trunks can remain MF as long as none of the NPA-NXXs served by the Type 2B end office or MSC contain any ported numbers. Further, the Type 2B end office and MSC can perform an NP-SCP query with the result indicating that the call should be routed to a Type 2B trunk group. Again, MF signaling can still be used in such cases as long as the Type 2B end office and MSC can retain the LRN for use with the associated Type 2A overflow trunk group, should all of the Type 2B trunks be found busy. Type 2B trunks can be converted to SS7 ISUP and optionally arranged for sending and receiving the LRN in the CdPN, and the FCI and GAP parameters in the SS7 ISUP IAM.

WSPs can make business arrangements for another provider to query and properly route the call to the ported-to network.

- Type 2C interconnection is a trunk interconnection between an MSC and an E911 tandem for Emergency Service calls. Signaling over Type 2C trunks is not impacted by WNP. Emergency Services feature interactions with WNP are covered in section 3.3.1.
- Type 2D interconnection is a trunk interconnection between an MSC and an Operator Tandem. Signaling over Type 2D trunks is not impacted by WNP. Operator Service feature interactions with WNP are covered in section 3.3.1.

## 5.8 Impacts to the Signaling Transfer Point

**Note:** It is recommended that all service providers utilize the GTT capability at their STPs for routing SS7 queries. Although MTP routing capability can be used, it will not be able to utilize all of the performance and administrative benefits of GTT.

The proposed NP architecture will have the following impacts on the STPs in the SS7 backbone network:

- If STP GTT is used, STPs must support a new TT value for routing messages to the WNP query messages to the NP-SCP. Wireless networks, for WNP queries, should use the same TT values as used in the wireline networks. <sup>36</sup>
- The STPs shall perform appropriate SS7 route and SCCP management for routing queries.
- If IMSI is implemented, the STPs must support GTT of IMSI for the new IMSI TT. Although IMSI has 15 digits, the STPs may need to perform GTT only 6-digit GTT on IMSI to locate the home service provider's network. If the home network supports multiple HLRs for the same mobile network code of the IMSI, it may have to perform GTT on greater than 6-digits of the IMSI in order to locate the HLR for the MS. Only the IMSI digits needed to perform GTT are required in the SCCP CdPA. The complete IMSI value used by the end application should be provided in the TCAP.
- STPs must have route-sets defined for every possible destination network with which the service provider has a roaming agreement.
- STPs should be able to support DN-to-HLR routing translation based on a new intra-network TT yet to be defined.
- STPs will perform Intermediate GTT (IGTT) for messages to remote network nodes and Final GTT (FGTT) for routing to the local network nodes.

## 5.9 Impacts to Global Title Translation

The impacts below apply to the location of GTT databases within a network. These impacts on apply to networks that plan to use GTT for the routing and management of query messages.

- The NP-GTT database is a six-digit GTT database located on the STP.
- It is perceived that MSID GTTs are STP based and are not impacted by number portability.
- MDN GTTs for inter-network service and capabilities are the most impacted in a number portability environment. Much discussion has occurred on whether to locate the MDN GTT database on the STP or on the NP-SCP. Regardless of location, MDN-GTTs may require interrogation of the TCAP portion of the message to complete the GTT lookup. A local SMS interface may be beneficial depending on the volume of updates received. The local SMS would provide updates for ported numbers. It is up to each service provider to update their default GTT databases for each inter-network service via existing service provider procedures.
- MDN-GTTs and the associated TCAP interrogation may be provided on STPs. The STPs provide GTT load sharing of queries to application SCPs and STPs. The STPs

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<sup>36</sup> A current move is underway to have separate NP TTs for each protocol as opposed to one TT for all three (i.e., AIN, IN, and WIN).

provide SCCP management in the case of application failures. Service providers need ensure correct and timely provisioning to avoid circular routing conditions between STPs performing GTT.

- MDN-GTTs on the SCP and the associated TCAP interrogation may be provided on N SCP (or other SCP) platform. The NP-SCPs should provide load sharing of queries to application SCPs and Gateway STPs as necessary. The SCPs should also provide SCC management in the case of application failures. Service providers need to ensure correct and timely provisioning to avoid circular routing conditions between STPs performing GTT and between STPs and SCPs performing GTT.
- MDN-GTTs on the SCP require a six-digit GTT database on the STP for each GTT database located on the SCP. This service provider managed database is used by the STP to locate the SCP performing the ten-digit GTT.

Another option is to follow a capability being studied by some land-line service providers. This is a capability where the NP-SCP changes the TT value and CdPA of GTT messages. This scenario requires a six-digit GTT at the STP, a ten-digit GTT at NP-SCP where a second TT value is reassigned and the changing of the CdPA to the LRN. A service provider that receives these messages from another network is required to support the new TT value and service based LRN database. Each receiving network required to have and maintain this database for this scenario to be successful.

### **5.10 Impacts to the Number Portability Service Control Point**

The WNP solution will have the following impacts on the NP-SCP (some of which are already known in the LRN solution):

- The NP-SCP must support WNP query messages from wireless network and a response message including the LRN of the ported subscriber's MSC.
- NP-SCPs should be deployed with redundant replicates for total availability. This will require synchronization of the data in all replicated units to be provided by a centralized service management system.
- NP-SCPs should comply with Bellcore GR-1280-CORE, AIN SCP Generic Requirements, Section 11. Requirement 11-4 demands that the Mean Response Time, the rated transaction load be 100 ms or less, and the 95% response time be 120 ms or less.
- The NP-SCP should implement congestion control and indicate such a condition to MSCs via ACG as to defined by IS-41 and/or GSM standards.

### **5.11 Impacts to Customer Care and Provisioning**

The following list describes the potential impact of NP on customer care and provisioning systems, depending upon a service provider's infrastructure:

- Some system in the Customer Acquisition/Care provisioning stream must interface to the regional SMS for negotiating/announcing ported numbers with the other service provider(s) and for querying existing subscriber records.
- Any system which interfaces with the regional SMS system must do so with the enhanced format of the Customer Account Record Exchange (CARE), also known as the Inter-Service Provider Maintenance, Administration, and Provisioning (ISPMAP) information.

### **5.12 Impacts to Billing**

The following list describes the potential impact of NP on billing and fraud management systems.

- Roaming tables may need to be modified to support both IMSI and MIN. If the billing systems store IMSI, standard call records will also need to be modified and expanded. Additionally, telephone inventory records must be modified.
- Billing systems will most likely need to support more than one identifier for a subscriber: MIN, IMSI, and/or MDN.
- Any system or process which is built on MIN must be modified to support another ID - rating, cycle changes, splits, et al.
- Fraud Management will also be impacted for the same reason as above. Call Detail Records from the visited service providers are currently extracted on the basis of NPA-NXX translation of the billed number.
- A billing module may have to be added to the existing AMA records for calls involving ported numbers. The details are for future study.
- A billing identifier may be added to the call setup or AMA records. Future study is required.
- Call data message handling (e.g., IS-124) needs must be addressed.

### **5.13 Impacts to Maintenance**

The following list describes the potential impact of NP on the maintenance operations:

- Performance and measurements
- Fault Detection, isolation and recovery
- Alarm detection and alarm reporting
- Maintenance and administration position
- Test procedures of the non-porting number, porting number and disconnected porting number

#### **5.14 Impacts to Number Portability Data Administration**

The following list describes the potential impact of NP on customer and network data administration.

- Service providers need to have an EDI interface for exchanging ported subscriber's data.
- WSPs must provide for an LSMS function to mediate the data sent from the NPAC-SMS to the NP-SCP, including the CMIP interface to the NPAC-SMS.
- WSPs must provide for an SOA function to mediate the data sent from the WSP's service order entry systems to the NPAC-SMS, including the CMIP interface to the NPAC-SMS.
- The CTIA Cellular Operations Record Distribution (CORD) and the LERG data distribution procedure must be updated to provide rapid exchange of PC/SSN, MIN, and other pertinent routing and subscription information.
- WSPs must provide for a means (e.g., an Operations Support System, manual) with which to provision network data, including
  - portable NPA-NXX block indicator for the MSCs,
  - new TT and new GTTs in the STPs,
  - HLR updates to include ported numbers, and
  - translation data in NP-SCP.

#### **5.15 Impacts to Service and Network Reliability**

The porting of a customer from one service provider to another requires provisioning changes that are both accurate, timely, and precisely coordinated between all service providers in a portable area. This provisioning is especially critical with respect to GTT databases. Incorrectly provisioned GTT databases can result in SCCP circular routing conditions that may utilize all of a link set's capacity within seconds. A circular routing mechanism is therefore needed that eliminates SCCP circular routed messages from occurring.

ANSI T1.112 provides procedures for SCCP message looping in the form of the SCCP Hop Counter. This hop counter is available in SCCP X-Unitdata (XUDT) messages only. Network elements will require upgrades to support XUDT message formats. Due to economics and desired dates of implementation, the UDT message will be used for number portability and existing applications. The XUDT message has been flagged as the desired long term solution.

### 5.16 Human Factors Impacts

Today, mobile subscribers may dial seven digits for calls within their home NPA. An NPA is pre-pended to the dialed digits for some mobile originated calls. In a Number Portability environment, 10 digits must be sent in the query to the NP-SCP. Wireless Number Portability driving the separation of MSID and MDN, with the possibility that the MSID (as MIN) will not reflect the NPA of the subscriber's MDN.

The question then is how will the MSC determine what NPA to pre-pend to a 7 digit dialed number. The call might be misrouted, or the wrong information sent to the NP-SCP, if the MSC relies on the MIN MSID or the NPA of the MSC to determine the NPA of the called number.

There are 3 possible solutions:

- (a) Require 10 digit local dialing for all mobile subscribers. This would treat all mobile subscribers equally (whether ported or non-portable) but may put the wireless carrier that implements 10 digit local dialing at a competitive disadvantage if the other local carriers, wireless or wireline, still support 7 digit local dialing. (A variation would be to have only the ported subscriber dial 10 digits. But that disadvantages that subscriber, would not meet dialing parity criteria, and would require the carrier to maintain multiple dialing plans for different classes of subscriber.)
- (b) Assign the ported subscriber an MSID in MIN format with the same NPA as the ported MDN. It is not clear if this would always be possible, and this practice may affect MSID administration and may lead to inefficient use of the MSID. (MIN administration is for further study.) If the mobile subscriber has an IMSI as MSID, and no MIN, the MSID provides no value for this process since an IMSI does not contain an NPA.
- (c) Use the NPA of the MDN of the calling mobile subscriber. This solution assumes that the calling party's MDN is available at the time of this substitution.

### 5.17 Service Impacts

The following impacts to services, as known today, are anticipated with the introduction of number portability as proposed in this document:

- Over the Air Activation must support the delivery of a MDN to the MS.  
The User Initiated Over The Air Function (OTAF) will not have impact with Call Origination on Wireless Number Portability. The Network Initiated OTAF with Call Termination will have some impact on Wireless Number Portability.
- CNIP must support the delivery of the MDN and not the MIN as the call party number for mobile originated calls.
- Emergency services must ensure that the subscriber is known to the operator by the MDN and not the MSID. Refer to section 3.3.2 for further discussion.

- Delivery of an SMS message to the Destination MC and ultimately the mobile station is based upon the MIN. In WNP, the delivery network only has the MDN of the mobile station. Therefore, the service is impacted in routing to the Destination MC. Refer to section 3.3.5 for presented solutions.

Impacts to CLASS type services are similar to those outlined in the ICCF document "INC Report on Number Portability," section 13.1.5.1.

There may also exist impacts to proprietary service implementations not appropriate for this document.

## 6. RELATED DOCUMENTS

The following documents can provide additional information regarding Number Portability

- *Industry Numbering Committee (INC) Report on Number portability, Industry Service providers Compatibility Forum (ICCF)*, INC 96-0607-013, July 11, 1996.
- *FCC First Report and Order and Further Notice of Proposed Rulemaking*, FCC 96- June 27, 1996.
- *Federal Communications Commission (FCC) Notice of Proposed Rulemaking (NPRM) for the Local Number Portability*, Docket Number 95-116, July 13, 1995.
- *Generic Requirements for SCP Application and GTT Function for Number Portability*, Illinois Number Portability Workshop, Issue 0.95, September 4, 1996.
- *Generic Switching and Signaling Requirements for Number Portability*, Illinois Number Portability Workshop, Issue 1.02, June 17, 1996.
- *CCPN, T1 Letter Ballot 557*
- *IMSI Assignment Guidelines and Procedures*, Version 1, February 12, 1996.
- *North American Numbering Council LNP Architecture and Administrative Plan*, Issued March 4, 1997.
- *T1 LB 557 Signaling System Number 7-Number Portability Call Completion to a Portable Number - Integrated Text*, currently in ballot to become an American National Standard

Information is available via the World Wide Web regarding number portability. In some cases, the above mentioned document may be found at these web sites.

- [www.fcc.gov](http://www.fcc.gov) - information regarding the NANC LNP activities, FCC orders, meetings, etc.
- [www.ported.com](http://www.ported.com) - this site contains various documents and information related to wireline portability.
- [www.tl.org/index/0701.htm](http://www.tl.org/index/0701.htm) - this site contains, among many other things, the CCPN document.

## 7. ISSUES

The following issues are currently being or must be investigated before implementing the WNP Solution:

- (a) How many LRNs will be assigned per MSC -- one per serving area, one per POP/POI, one per NPA-NXX, one per MSC, and/or one per MC (if multiple MCs are associated with an MSC)?
- (b) Are there any methods wireless could employ for more efficient routing.

The following text was submitted as contribution to this document but has not been agreed upon:

**"Call routing for mobile to mobile calls can be more efficient if the originating wireless network can identify that the outgoing call is wireless. There are two options for identifying a wireless call:**

- The Originating MSC could maintain a list of LRNs assigned to MSCs. After the MSC receives the LRN in the WNP Query Response, the MSC can check to see if the LRN is assigned to an MSC.
- A wireless indicator could be maintained in the NP-SCP. The indicator would be returned in the WNP Query Response along with the LRN. This option requires significant effort and corporation with all industry providers.

**An originating MSC, upon identifying an outgoing wireless call, may route a Location Request message to the called party's HLR using a 6-digit LRN to HLR GTT a the STP or per internal translations. (Note: If there are multiple HLRs, either the MSC has multiple LRNs or more than 6-digits may be needed for the GTT.) If the called party is roaming, the HLR will return the TLDN in the location request return result message. The originating MSC can route the call using the TLDN."**

- (c) The impact of WNP with regard to Emergency Callback whether the call back is over roamer access port or otherwise requires further study.
- (d) Performance and capacity impacts should be studied.
- (e) How will MINs be administered?
- (f) It may be assumed that providing resellers with numbers in and of itself does not make these numbers ported (and thus have LRNs assigned in the NP database). However, what if a reseller wishes to resell off a different facility provider and still retain its

numbers? Can a reseller port a block of numbers? What other issues will existing WNP have with resellers? The treatment of resellers, resellers numbers and number portability will be noted on this issue list and addressed at some future date.

- (g) Uniform treatment by wireline providers of calls to wireless subscribers continues to be an issue. Will the rating be based on the original wireline rate center or the fact that the subscriber is being served by a WSP?
- (h) Will notification of an NPA-NXX opening for portability in order to provision the MSN be obtained from the LERG? If so, what is the process and system impact? Will this data also be available from the NPAC-SMS, and if so, in an automatic download?
- (i) A standard solution (for the included alternatives or other) for delivery of a short message to a ported MDN must be chosen.
- (j) Impacts of WNP on Code Splits must be further studied.
- (k) The following implementation alternatives have been submitted for contribution in order to aid the complexities of routing a Location Request to the HLR from the gateway MSC:
  - The MSC can translate the called MDN to the address of the called subscriber's HLR.
  - The SS7 Signaling network can translate the called MDN to the address of the associated subscriber's HLR.
  - The Originating MSC can query a NP-SCP to obtain the LRN, and route the signaling message to the HLR associated with the LRN.

Choosing the appropriate solution for the problem documented in Section 3.1.8.1 requires further study.

## 8. LIST OF ACRONYMS

The following acronyms have been used within this document.

<i>Acronym</i>	<i>Expansion</i>
ACG	Automatic Code Gap
AIN	Advanced Intelligent Network
AMA	Automatic Message Accounting
AMPS	Advanced Mobile Phone System
CC	Customer Care
CCPN	Call Completion to a Ported Number
CDMA	Code Division Multiple Access
CdPA	Called Party Address
CdPN	Called Party Number
CFNA	Call Forward No Answer
CgPA	Calling Party Address
CgPN	Calling Party Number
CLASS	Custom Local Area Signaling Services
CMIP	Common Management Interface Protocol
CMRS	Commercial Mobile Radio Service
CNAM	Calling Name
CORD	Cellular Operations Record Distribution
CTIA	Cellular Telecommunications Industry Association
DN	Directory Number
EDI	Electronic Data Interchange
EO	End Office
ESN	Electronic Serial Number
ESP	Emergency Service Provider
FCC	Federal Communications Commission
FCI	Forward Call Indicator
FGD	Feature Group D
GAP	Generic Address Parameter
GSM	Global System for Mobile Communications
GTT	Global Title Translation
HLR	Home Location Register
IAM	Initial Address Message
IMSI	International Mobile Station Identifier (E.212)
IN	Intelligent Network
IS-41	Interim Standard - 41
ISDN	Integrated Services Digital Network
ISUP	ISDN User Part
IXC	Inter Exchange Carrier
LATA	Local Access Transport Area

<i>Acronym</i>	<i>Expansion</i>
LEC	Local Exchange Carrier
LERG	Local Exchange Routing Guide
LIDB	Line Information Database
LRN	Location Routing Number
LSMS	Local Service Management System
LSP	Local Service Provider
MC	Message Center
MCC	Mobile Country Code
MDN	Mobile Directory Number
MIN	Mobile Identification Number
MNC	Mobile Network Code
MS	Mobile Station
MSA	Metropolitan Statistical Area
MSC	Mobile Switching Center
MSID	Mobile Station Identifier
MSIN	Mobile Station Identification Number (as part of IMSI)
MTP	Message Transfer Part
NANC	North American Numbering Council
NANP	North American Numbering Plan
NE	Network Element
NP	Number Portability
NP-SCP	Number Portability Service Control Point
NPAC-SMS	Number Portability Administrative Center Service Management System
NPRM	Notice of Proposed Rulemaking
O-MSC	Originating Mobile Switching Center
OAM&P	Operations, Administration, Maintenance, and Provisioning
OEO	Originating End Office
OSS	Operations Support System
OTAF	Over The Air Function
PC	Point Code
PODP	3/6/10 Digit Public Office Dialing Plan
POI	Point of Interconnection
POP	Point of Presence
PSTN	Public Switched Telecommunications Network
RBOC	Regional Bell Operating Company
SCCP	Signaling Connection Control Part
SCPs	Service Control Points
SME	Short Message Entity
SMR	Specialized Mobile Radio
SMS	Service Management System
SMS	Short Message Service
SOA	Service Order Activation
SP	Service Provider

<i>Acronym</i>	<i>Expansion</i>
SS7	Signaling System 7
SSN	Sub-System Number
STP	Signal Transfer Point
TCAP	Transaction Capabilities Application Part
TCPN	Translated Called Party Number
TDMA	Time Division Multiple Access
TEO	Terminating End Office
TLDN	Temporary Local Directory Number
TT	Translation Type
V-MSC	Visited Mobile Switching Center
VLR	Visiting Location Register
WIN	Wireless Intelligent Network
WNP	Wireless Number Portability
WSP	Wireless Service Provider

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

**DOCKET FILE COPY ORIGINAL**

In the Matter of )  
 )  
Application of BellSouth Corporation, )  
BellSouth Telecommunications, Inc. )  
and BellSouth Long Distance, Inc. )  
for Provision of In-Region, InterLATA )  
Services in Louisiana )

CC Docket No. 97-231

**Exhibit N:**  
**Excerpts from Department of Justice Evaluation**  
**in CC Docket No. 97-208**

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc., and	)	
BellSouth Long Distance, Inc., for	)	CC Docket No. 97-208
Provision of In-Region, InterLATA	)	
Services in South Carolina	)	
	)	

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EVALUATION OF THE  
UNITED STATES DEPARTMENT OF JUSTICE

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November 4, 1997

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### **Summary of Evaluation**

BellSouth's application to provide in-region interLATA service in South Carolina should be denied.

Applications under section 271 should be granted only when the local markets in a state have been fully and irreversibly opened to competition. This standard seeks to ensure that the barriers to competition that Congress sought to eliminate in the 1996 Act have in fact been fully eliminated and that there are objective criteria to ensure that competing carriers will continue to have nondiscriminatory access to the facilities and services they will need from the incumbent BOC.

At this time, BellSouth faces no significant competition in local exchange services in South Carolina. Lacking this best evidence that the local market has been opened to competition, the Department cannot conclude that its competition standard is satisfied unless BellSouth shows that significant barriers are not impeding the growth of competition in South Carolina. BellSouth has not done so in this application.

BellSouth has failed to demonstrate that it offers access to unbundled network elements in a manner that allows requesting carriers to combine such elements in order to provide telecommunications service, as required by the 1996 Act.

It has also failed to demonstrate its ability to provide adequate, nondiscriminatory access to the operations support systems that will be critical to competitors' ability to obtain and use unbundled elements and resold services.

It has failed to demonstrate that it offers cost-based prices for unbundled network elements that permit entry and effective competition by efficient competitors.

And, it has failed to measure and report all of the indicators of wholesale performance that are needed to demonstrate that it is currently providing adequate access and interconnection and to ensure that acceptable levels of performance will continue after section 271 authority is granted.

Competitive benefits in markets for interLATA services do not justify approving this application before BellSouth's local market has been fully and irreversibly opened to competition. BellSouth's estimates of the magnitude of those benefits rest on unconvincing analytical and empirical assumptions, but more importantly, its analysis fails to give adequate consideration to the more substantial benefits from increased competition in local markets that will be gained by requiring that local markets be opened before allowing interLATA entry.

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Application by BellSouth Corporation,	)	
BellSouth Telecommunications, Inc., and	)	
BellSouth Long Distance, Inc., for	)	CC Docket No. 97-208
Provision of In-Region, InterLATA	)	
Services in South Carolina	)	
	)	

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EVALUATION OF THE  
UNITED STATES DEPARTMENT OF JUSTICE

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The United States Department of Justice ("the Department"), pursuant to Section 271(d)(2)(A) of the Telecommunications Act of 1996 ("1996 Act" or "Telecommunications Act"),<sup>1</sup> submits this evaluation of the application filed by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc. (collectively "BellSouth") on September 30, 1997, to provide in-region, interLATA telecommunications services in the state of South Carolina.

As the Department has previously explained, in-region interLATA entry by a Bell Operating Company ("BOC") should be permitted only when the local markets in a state have

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<sup>1</sup> Pub. L. No. 104-104, 110 Stat. 56 (1996) (codified as amended in various sections of 47 U.S.C.).

been fully and irreversibly opened to competition.<sup>2</sup> This standard seeks to ensure that the barriers to competition that Congress sought to eliminate in the 1996 Act have in fact been fully eliminated and that there are objective criteria to ensure that competing carriers will continue to have nondiscriminatory access to the facilities and services that they will need from the incumbent BOC.

In applying this standard, the Department will consider whether all three entry paths contemplated by the 1996 Act -- facilities-based entry involving construction of new networks, the use of unbundled elements of the BOC's network, and resale of the BOC's services -- are fully and irreversibly open to competitive entry to serve both business and residential consumers. To do so, the Department will look first to the extent of actual local competition as the best evidence that local markets are open. The degree to which such entry is broad-based will determine the weight the Department places on it as evidence. If broad-based commercial entry involving all three entry paths has not occurred, the Department will examine competitive conditions to see whether significant barriers continue to impede the growth of competition and whether benchmarks to prevent backsliding have been established. Wherever practical, this examination

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<sup>2</sup> This open market standard is explained more fully in Application of SBC Communications, Inc. et al., Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region InterLATA Services in the State of Oklahoma, Evaluation of the United States Department of Justice, CC Docket No. 97-121, at vi-vii and 36-51 (May 16, 1997) ("DOJ Oklahoma Evaluation") and in the Affidavit of Marius Schwartz ("Schwartz Aff."), attached to the instant Evaluation as Exhibit 1. Other aspects of the Department's criteria for evaluating applications under section 271 are addressed in the DOJ Oklahoma Evaluation and in Application of Ameritech Michigan Pursuant to Section 271 of the Telecommunications Act of 1996 to Provide In-Region InterLATA Services in the State of Michigan, Evaluation of the United States Department of Justice, CC Docket No. 97-137 (June 25, 1997) ("DOJ Michigan Evaluation").

will focus on the history of actual commercial entry. The experience of competitors seeking to enter a market can provide highly probative evidence concerning barriers to entry, or the absence thereof. However, we do not regard competitors' small market shares, or even the absence of entry, standing alone, as conclusive evidence that a market remains closed to competition, or as a basis for denying an application under section 271. For a variety of reasons, potential competitors may not immediately seek to use all entry paths in all states, even if the barriers to doing so have been removed, and a BOC's entry into interLATA services should not be delayed because of the business strategies of its competitors.

At this time, BellSouth faces no significant competition in local exchange services in South Carolina. Lacking this best evidence that the local market has been opened to competition, the Department cannot conclude that our competition standard is satisfied unless BellSouth proves that significant barriers are not impeding the growth of competition in South Carolina. That it has failed to do. Although BellSouth asserts that it has met the checklist and public interest requirements of section 271, but that assertion rests in large measure on BellSouth's view as to the nature of those requirements -- a view that is often at odds with the plain language of the statute and with the Commission's prior decisions, as well as the 1996 Act's underlying competition policy on which the DOJ bases its evaluation. While we believe that BellSouth has made important progress towards fulfilling its responsibilities under the Telecommunications Act to open its local markets to competition, the evidence available in the present application falls well short of demonstrating compliance with several critical prerequisites for approval. In particular,